

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BARBARA R. KAPLAN)
Plaintiff)
v.) Case No.: 1:07-cv-06668
DAVIDSON & GRANNUM, LLP,)
SANDRA D. GRANNUM & DAVID L. BECKER)
Defendants.)

JOINT STATUS REPORT

A. The date and time this matter is set for a status hearing before the Court.

Initial Status Hearing is set for July 22, 2008 at 11:00 AM

B. The attorneys of record for each party, indicating which attorney is expected to try the case.

Claimant: **Gregg Rzepczynski**
Gregg Rzepczynski and Associates Ltd
175 West Jackson Suite 1650
Chicago, Illinois 60604
Telephone: (312) 939-8028
Facsimile: (312) 704-1552

Defendants: **Daniel E. Tranen**
Geoffrey A. Belzer
Wilson, Elser, Moskowitz, Edelman &
Dicker LLP
120 North LaSalle Street
Suite 2600
Chicago, Illinois 60602
Telephone: (312) 704-0550
Facsimile: (312) 704-1522

C. The basis of federal jurisdiction.

Defendants removed this matter from the Circuit Court of Cook County pursuant to 28 U.S.C. § 1441 based upon diversity of citizenship and a dispute over money in an amount greater than \$75,000.

D. Whether a jury has been requested and by which party.

The Plaintiff will request a Jury Trial.

E. A brief statement of the nature of the case including:

- a. The major factual and legal issues in agreement, and

The parties agree there was an attorney client relationship between the Plaintiff (client) and the Defendants (attorneys).

- b. The major factual and legal issues in dispute.

Whether within the context of that relationship a (i) breach of contract occurred, (ii) legal malpractice occurred and (iii) a breach of fiduciary duty occurred.

F. The relief sought by any party, including computation of damages, if available.

The Plaintiff is seeking money damages in excess of seventy million dollars.

G. The name of any party who or which has not been served, and any relevant facts or circumstances related to service of process of such party.

All named parties have been served.

H. A brief description of all anticipated motions.

**Defendants may file a Motion Transfer pursuant to 28 U.S.C. § 1404..
Should this Court retain jurisdiction, Defendants anticipate filing a motion for summary judgment.**

I. A proposed discovery plan pursuant to Fed. R. Civ. P. 26(f), including a brief description of what discovery has been taken, if any, what remains to be taken, a schedule for expert designations and discovery, and a proposed discovery cutoff. Unless other ordered, Rule 26 (a) (1) does not apply.

As of this date no discovery has been taken by either side. The parties anticipate undertaking extensive written discovery, as well as oral depositions of numerous witnesses throughout the country. The parties believe that this discovery can be completed within the next nine months.

J. The earliest date the parties would be ready for trial and the probable length of trial.

The earliest trial date will be August 1, 2009 and anticipated length of trial is one-two weeks.

K. The status of any settlement discussions and whether a settlement conference with the Court would be useful.

No substantive settlement discussions have occurred to date. A settlement conference would be helpful after the motion to transfer is adjudicated.

L. Whether the parties will consent to trial before a magistrate judge.

Plaintiff declines to consent.

Respectfully submitted.

/S/ Gregg Rzepczynski
Gregg Rzepczynski
Greg Rzepczynski and Associates
Counsel for Claimant

/S/ Geoff Belzer
Geoffrey Belzer
Wilson, Elser, Moskowitz, Edelman &
Dicker LLP
Counsel for Defendants